

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA**

IN RE: BARD IVC FILTERS
PRODUCTS LIABILITY LITIGATION

No. MD-15-02641-PHX-DGC
MDL 2641

John R. Lowe, Jr.,
Plaintiff,

v.

Civil Action No.: 2:17-cv-04466

C.R. Bard, Incorporated, et al
Defendants,

MOTION FOR LEAVE TO AMEND COMPLAINT

Plaintiff, **JOHN R. LOWE, JR.**, pursuant to the applicable Federal Rule of Civil Procedure 15(a)(2), by and through the undersigned Counsel, hereby seeks to amend the Complaint.

Plaintiff, **JOHN R. LOWE'S** initial Complaint was filed via CM/ECF on December 4, 2017. Complaint in error did not include the correct filter model: **G2® Express (G2®X) Vena Cava Filter**. Counsel for Plaintiff has conferred with counsel for Defense who has stated they do not oppose this Motion.

WHEREFOR, Plaintiff, **JOHN R. LOWE, JR.**, respectfully requests that this Court grant Plaintiff's Motion for Leave to Amend Complaint.

Dated: January 11, 2019

Respectfully submitted,

s/Peyton P. Murphy

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